

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA



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RHINO CONSERVATION, THE ILLEGAL KILLING AND HUNTING OF RHINOCEROS IN SOUTH AFRICA
AND COMMENTS ON THE PROPOSAL SUBMITTED BY KENYA TO PLACE A ZERO QUOTA FOR THE
EXPORT OF HUNTING TROPHIES OF WHITE RHINOCEROS

This document has been submitted by South Africa, in relation to amendment proposal CoP16 Prop. 10 on the white rhinoceros (*Ceratotherium simum simum*)*.

* *The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat or the United Nations Environment Programme concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.*



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

INFORMATION ON RHINO CONSERVATION, THE ILLEGAL KILLING AND HUNTING OF RHINOCEROS IN SOUTH AFRICA AND COMMENTS ON THE PROPOSAL SUBMITTED BY KENYA TO PLACE A ZERO QUOTA FOR THE EXPORT OF HUNTING TROPHIES OF WHITE RHINOCEROS

BACKGROUND

Over 90 per cent of Africa's white rhino and approximately 35% of Africa's black rhino occur in South Africa. The rhino population in South Africa is now being threatened by an upsurge in the illegal killing of rhinos with 668 rhinos lost to poaching during 2012.

Poaching has decimated almost all rhino populations in twenty five (25) African rhino range states. As South Africa's white rhino population is the largest remaining viable population in the world, the poaching intensity in South Africa is relatively high. It has been established that rhino poaching is no longer solely an environmental crime, but constituted a highly organised crime of sophistication that may also threaten national security.

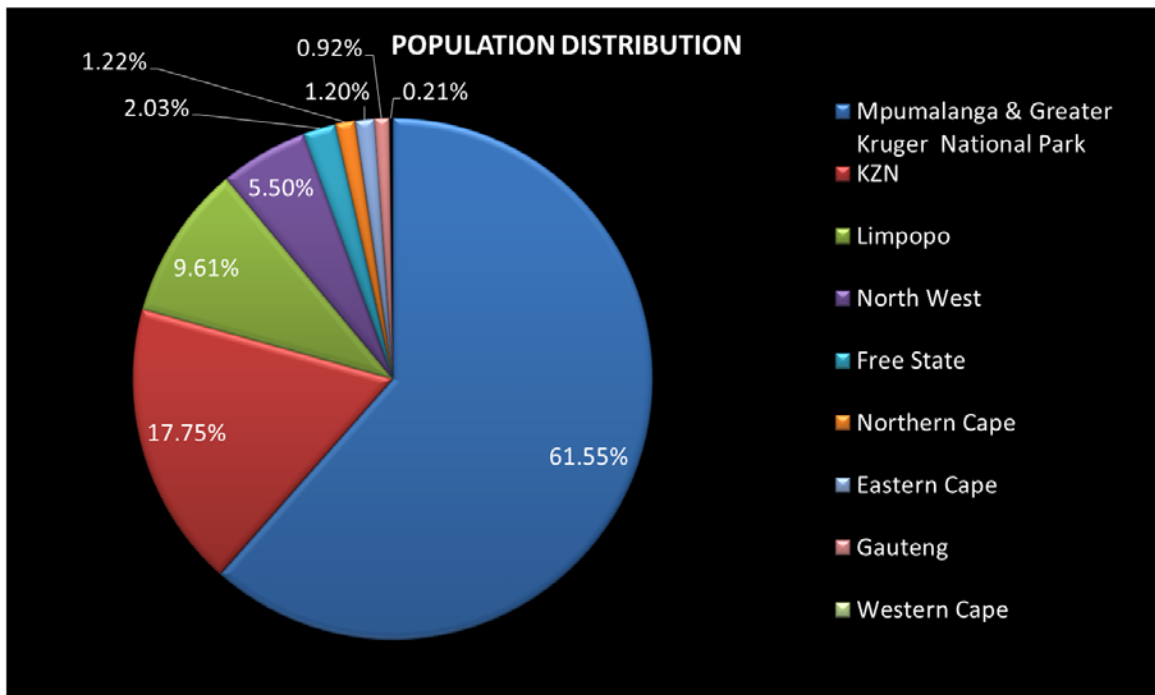
POPULATION INFORMATION

The following table provides a breakdown of the population sizes of the sub-species that occur in South Africa:

Species	WHITE RHINO <i>Ceratotherium simum</i>		TOTAL WHITE RHINO	BLACK RHINO <i>Diceros bicornis</i>			TOTAL BLACK RHINO	TOTAL ALL RHINO
	Sub-Species <i>C.s. cottoni</i>	<i>C.s. simum</i>		D.b. bicornis	D.b. michaeli	D.b. minor		
South Africa		18 796	18 796	171	60	1 684	1 915	20 711

Source: IUCN SSC African Rhino Specialist Group

Rhino populations occur in formally proclaimed conservation areas as well as on private land, with the private sector contributing approximately 2.2 million hectares of land towards rhino conservation, with more than 4 000 rhino in private ownership. The populations occur throughout South Africa in all its provinces:



South Africa is fast approaching the limit of available habitat for white and black rhino on state owned land. This means that in order to continue to grow the species, new habitat within South Africa or the expansion of existing ranges in other states will be required soon. Established rhino populations should be maintained at 75 per cent of

Ecological Carrying Capacity (ECC) to maintain actively growing populations, and provide surplus animals (5 % and 8 % of population) for other populations and growth areas.

The illegal killing of rhinoceros in South Africa escalated in 2008, when 83 rhinoceros were killed. Prior to that, from 2000 – 2007, the highest number of animals poached during a single year was 25 (2002).

Figure: Number of rhinoceros illegally killed in South Africa (2000 – 2012)

SA	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
KNP (SANParks)	0	4	20	14	7	10	17	10	36	50	146	252	425
MNP (SANParks)	0	0	0	0	0	0	0	0	0	0	0	6	3
GP	0	0	0	0	0	0	0	0	0	7	15	9	1
LIM	0	0	0	0	0	0	0	0	23	16	52	74	59
MP	0	0	0	0	0	0	2	3	2	6	17	31	28
NW	0	0	0	0	0	2	0	0	7	10	57	21	77
EC	0	0	0	0	0	0	0	0	1	3	4	11	7
FS	0	0	0	0	0	0	0	0	0	2	3	4	0
KZN	7	2	5	8	3	1	5	0	14	28	38	34	66
WC	0	0	0	0	0	0	0	0	0	0	0	6	2
NC	0	0	0	0	0	0	0	0	0	0	1	0	0
	7	6	25	22	10	13	24	13	83	122	333	448	668

The overwhelming cause of the decline in rhinoceros in some range States has been poaching, stimulated by demand for rhino horn used for traditional craft and traditional medicinal purposes by consumer nations in the middle-east and in Asia. Nonetheless, although poaching is prevalent and increasing in South Africa, the number of live births still exceeds the number of deaths (including poached rhino). The national average growth rate of the white rhino population was just over 7% from 1991 to 2010; inclusive of animals lost to poaching. Approximately 4% of the national population is currently (2012) lost to poachers, well below the average net 7.2% rate of increase in the white rhino population.

The Department of Environmental Affairs (DEA) with other law enforcement agencies in South Africa have been implementing various interventions to reduce the number of illegal killings of rhinoceros and the subsequent trade in illegally obtained rhinoceros horns. These include, among others, the following since CoP15 in 2010:

- The publication of a National Strategy for the Safety and Security for Rhinoceros population in South Africa in October 2010;
- The hosting of a Rhino Summit by the Minister of Water and Environmental Affairs in October 2010 which augmented and endorsed the initiatives against rhino poaching. It also afforded stakeholders a high level opportunity to reflect on the interventions and harnessed further political and broader stakeholder commitment;
- The South African Police Service and the South African National Defence Force deployed members in Kruger National Park to assist with anti-poaching operations and border control respectively;
- The South Africa Police Service declared the illegal killing and trade of rhinos and rhino horn as a priority crime in 2011 resulting in the "Operation Rhino" project. There is constant monitoring and evaluation of the project and where gaps are identified, interventions are made;
- The drafting of a Mutual Legal Assistance agreement with Hong Kong to enable South Africa to take DNA samples of rhino horns which were confiscated in Hong Kong and use it as evidence in court should the horns originate from South Africa and
- The signing of a Memorandum of Understanding (MoU) with VietNam in December 2012. The objective of the MoU is to promote cooperation between the two countries in the field of biodiversity management, conservation and protection. Particularly aimed at curbing the scourge in rhino poaching, the MoU seeks to promote cooperation in law enforcement, compliance with CITES and other relevant legislation and Conventions on the basis of equality and mutual benefit.

LEGISLATIVE INTERVENTIONS

On 13 February 2009, South Africa published a national moratorium on the sale of individual rhinoceros horns and any derivatives or products within South Africa. It was clear in 2008 that an illegal domestic trade had developed, fuelled by the pilfering of both legally obtained and illegal obtained horns onto the international market. Enforcement officials detected that rhino horn sold to non-South African citizens were subsequently illegally exported from South Africa. The illegal export and the illegal killing of rhino for its horn were viewed as a threat to the rhino population in South Africa. Poaching in the years preceding the emergence of this illegal trade was low (2007: 13 rhino poached), but increased substantially in 2008 when 83 rhinos were poached. This represents a 600% increase within one year. The national moratorium was aimed at preventing the sale of horns that could leak onto the illegal international market. The moratorium furthermore provided enforcement officers in Provincial Conservation Authorities and South African National Parks (SANParks) an opportunity to ensure that approaches and protocols for dealing with the trade in rhino horn within South Africa were consistent and complied with the requirements of national legislation. It also intended to curb the increase in the illegal trade in rhino horns and discourage the poaching of rhinos in South Africa. This moratorium was promulgated in terms of Section 57(2) of the National Environmental Management: Biodiversity Act, 2004 (Act No 10 of 2004).

Soon after the moratorium was implemented, government officials observed an increase in applications for hunting permits for white rhino from Vietnamese and Thai citizens. It was established that the majority of these applications resulted in "pseudo-hunts", where the applicants were paid by a third party to carry out the hunts, but the horns were not retained by the applicants as a trophy. To address this, as well as other matters requiring uniform implementation, the Minister of Water and Environmental Affairs published on 20 July 2009, National Norms and Standards for the Marking of Rhinoceros Horn and the Hunting of White Rhinoceros for Trophy Hunting Purposes. The National Environmental Management: Biodiversity Act, 2004 (Act No 10 of 2004) makes provision for the issuance of permits for restricted activities involving listed threatened or protected species (such as white rhino and black rhino), for *inter alia* hunting, and the norms and standards were published to specify further requirements relating to marking and hunting of white rhino. The norms and standards ensured the national coordination of applications for hunting permits (by the Department of Environmental Affairs), through the establishment of a national register. The Department of Environmental Affairs also liaises with importing countries and makes recommendations, relating to the applications received by provincial conservation authorities, to these authorities.

The Department established and maintains the above mentioned register of all applications received in South Africa to hunt white rhino. Since becoming a legal obligation in 2009, the information has been recorded in the register.

The number of applications to hunt white rhino received per annum is as follows:

2009: 111 applications received

2010: 166 applications received

2011: 222 applications received

2012: 91 applications received

In the proposal submitted by Kenya, CoP 16 Prop. 10, for amendment of the annotation for *Ceratotherium simum simum* for a zero quota in hunting trophies from South Africa and Swaziland until at least CoP18, reference is made to a 300% increase in hunters from the United States of America from 2010 to 2012. This is unfortunately based on incomplete information used by Kenya, due to the lack of consultation with South Africa regarding the substance of the proposal. The majority of hunting clients that visit South Africa to hunt are from the United States of America, followed by clients from European countries. Hunters from these countries historically visited South Africa to hunt but in 2010 fewer clients (5 in total) from the USA applied to hunt rhino (the reason for this is not clear, but there is speculation that due to the pseudo hunting taking place, the price for trophy hunting of rhino was inflated). In 2009, eleven (11) applications were received from hunting clients from the USA and exactly the same number of applications was received in 2011. In 2012, nineteen (19) applications were received from clients from the USA, an 86% increase (and not a 300% increase). South Africa will continue to liaise with importing countries to monitor the movement of horn and to share information on any new developments relating to the possible abuse of the system.

Due to the high number of hunting applications from Vietnamese citizens, and the fact that the South African government received information that rhino horn trophies exported to Vietnam do not remain in the possession of the hunter, the Department of Environmental Affairs (DEA) wrote a letter to the Vietnamese CITES Management Authority in February 2012 to request them to conduct inspections in order to verify that rhino horns exported as part of a hunting trophy are still in the possession of the hunter. To date no official feedback has been received from Vietnam and a decision was taken to not issue any hunting permits for hunting clients whose country of usual residence is Vietnam, pending feedback from Vietnamese authorities. No hunting permit has been issued to applicants with Viet Nam as their country of usual residence since February 2012.

There has been a significant reduction in the number of applications received in 2012. The norms and standards implemented in 2009 were amended during 2011 to strengthen specific provisions relating to marking and hunting, including the requirement that an applicant must provide proof that he / she is a *bona fide* hunter; compulsory attendance of hunts by Environmental Management Inspectors and the requirement to take samples for DNA analysis directly after the hunt, as well as when live animals are being translocated. The Norms and Standards for the Marking of Rhinoceros and Rhinoceros Horn and for the Hunting of Rhinoceros for Trophy Hunting Purposes (the amended norms and standards) were published in the government gazette on 10 April 2012 for implementation and had a significant impact on the number of applications for hunting of white rhino. The most significant result seems to be the reduction / cessation in applications from East Asian countries, due to the fact that the applicant must provide evidence of hunting experience or membership of a hunting association. Another important intervention is the fact that all hunts are attended by officials from the provincial conservation authorities and DNA samples are taken at these hunts. The amended norms and standards resulted in an immediate decline in hunting applications, as can be observed from the information provided above (2012: 91 applications received; 2011: 222 applications received).

It should be noted that South Africa refused applications made by two hunting clients from one of the European Union (EU) member states due to the fact that the potential hunters could not provide evidence of previous hunting experience, and the CITES Management Authority of that country indicated to South African authorities that licenses / permits to hunt within the EU Country had not been issued to these individuals. It was therefore clear that the applicants were not *bona fide* hunters. CITES Parties have been of great assistance in terms of collaboration and cooperation on white rhino hunting permit applications. Through this collaboration, together with improved monitoring, any potential abuse of the system can be detected and appropriate actions taken to address it.

PROSECUTIONS

The National Prosecuting Authority of South Africa is collaborating closely with the various enforcement entities in South Africa in investigating cases of illegal killing of rhinos. The alarming rate of rhinos killed in South Africa over the past two years has prompted the National Director of Public Prosecutions to assign twenty prosecutors specifically to rhino cases. These prosecutors are doing excellent work in securing convictions and are working tirelessly with law enforcement agencies to ensure that rhino poachers are successfully prosecuted. The courts have imposed harsh sentences in a bid to deter offenders and the latest conviction in which a Thai citizen, who was arrested for involvement in the illegal trade of rhino horns obtained through pseudo hunts, was sentenced to 40 years in jail without an option of a fine, is indicative of the successes achieved in terms of prosecutions.

South Africa is committed to continue fighting the illegal killing of its rhinos and will leave no stone unturned in the investigation and prosecution of all cases of illegal killing of rhinos and the illegal trade in rhino horn. However, South Africa needs the cooperation of importing and consumer countries to assist in the investigation and prosecution of illegally traded rhino horn cases, in order to ensure that legally imported rhino hunting trophies are not being sold or donated to third parties and that legally obtained trophies are only imported by the hunters themselves. Exchange of information on possible illegal activities and other intelligence is of utmost importance for effective compliance monitoring and enforcement.

RHINO MANAGEMENT

In South Africa, some of the areas managed by government entities are reaching their productive carrying capacities for white rhino and there is a need to remove surplus animals to maintain maximum population growth rates. The continued growth and expansion of the rhino populations and range through the introduction of herds in new areas are therefore reliant on the private sector and communities making their land available for the introduction of rhinos sourced from protected areas and privately owned herds. The incentives for private land owners and communities to make land available are mostly economic incentives, including potential live sales from productive herds, eco-tourism and hunting. Due to the high levels of poaching and therefore the risks associated with the ownership of rhino, the economic incentives are sometimes outweighed by the costs relating to interventions required to secure rhino populations.

In the past, the incentives referred to above has resulted in an increase in rhino populations on private land and there is currently more than 4 000 rhino on private land in South Africa.

Many of the surplus white rhinos sold to the private sector were removed from protected areas managed by government entities. The funds generated through the sale of live rhinos assisted in subsidizing the high cost associated with conservation efforts and in some instances enabled entities to procure additional land for conservation. White rhino sales have been the biggest contributor to the total turnover at game auctions held by the conservation authority in KwaZulu-Natal Province, where it accounted for 74.9% of the total turnover from 2008 to July 2011. The weighted average price obtained for white rhino from KwaZulu/Natal and South African National Parks in 2011 is ZAR234 405. Any decline in demand for surplus rhino and any declines in price will negatively affect government conservation agencies executing their greater conservation mandate. The prices at a Vleissentraal auction in September 2012 was significantly lower than the aforementioned prices, with white rhino being sold for between ZAR135 000 and ZAR160 000. This could be indicative of the disinvestment by the private industry observed in some provinces.

It is believed by experts that white rhino hunting has contributed to the conservation of the species, through providing economic incentives to landowners. There is therefore a concern that any moratorium/zero quota on the export of hunting trophies might result in reduced demand for live rhino, resulting in a decrease in prices for live white rhino. If such a zero quota is introduced it will have far-reaching impacts, resulting in further disinvestment by the private sector; limiting live off-take in conservation areas; limiting ability to maintain maximum growth rates in populations reaching carrying capacity; resulting in overall reduction in meta-population expansion and population growth. Through this knock-on effect the impact of illegal killing will become more significant and may result in a more immediate decline in the species.

To ensure the long-term conservation of both the black and the white rhino, a biodiversity management plan for black rhino has been developed and a draft biodiversity management plan for white rhino will be finalized early in 2013. These plans include action plans with specific deliverables to be achieved to secure the long-term survival of the species.

INTERNATIONAL COOPERATION

South Africa's Minister of Water and Environmental Affairs signed a Memorandum of Understanding (MoU) with the Minister of Agricultural and Rural Development of the Socialist Republic of Viet Nam, Dr Cao Duc Phat. The MoU between the two countries is on cooperation in the field of Biodiversity Conservation and Protection and was signed in Hanoi, Vietnam on 10 December 2012. Particularly aimed at curbing rhino poaching, the MoU seeks to promote cooperation in law enforcement, compliance with CITES and other relevant legislation and Conventions on the basis of equality and mutual benefit. Officials from both countries are currently working on a draft Plan of Action with short and long term activities which include activities to curb the illegal trade in rhino horn.

Discussions relating to a similar MoU are ongoing with the People's Republic of China and it is anticipated that significant progress will be made in 2013 in this regard.

The CITES Management Authority liaise with a number of Parties regarding applications received to hunt White rhino. This has been very effective and continued collaboration and cooperation with increased information sharing will further assist in monitoring compliance with the Convention and national legislation, where appropriate.

NON-DETRIMENT FINDING (NDF)

In August 2012, South Africa's Scientific Authority issued a non-detriment finding for white rhino, and in November

2012 assessed the CITES listing of South Africa's white rhino population in relation to the biological criteria (inclusive of population size, distribution and growth rate) and trade criteria underpinning the inclusion of species on Appendices I and II (Resolution Conf. 9.24 (Rev. CoP 15)).

Population size:

According to data gathered from a survey of rhinos on private and state land by the IUCN African Rhino Specialist Group, the total South African white rhino population consists of approximately 18,800 individuals (as at the end of 2010). This estimate takes into account animals lost to poaching. South Africa's white rhino is

therefore scored as a “common” species in the NDF (non-detriment finding) undertaken by South Africa’s Scientific Authority in accordance with the CITES NDF checklist (question 6 (national abundance)). The numerical guideline for a “small population” provided in Annex 5 to Resolution Conf. 9.24 (Rev. CoP 15) is 5,000 individuals for some low productivity species, whereas populations with 10,000 or fewer individuals are considered small in terms of the Guidelines for Using the IUCN Red List Categories and Criteria (May 2003).

Distribution:

The distribution of South Africa’s white rhino population is fragmented but widespread in the country, with populations of white rhino occurring in all nine provinces in both state owned and private protected areas and game farms. In the NDF for white rhino, the Scientific Authority gave South Africa’s white rhino population a low score for question 5 (national distribution) of the CITES NDF checklist, indicative of a low risk in relation to the species’ distribution. According to Annex 5 to Resolution Conf. 9.24 (Rev. CoP 15), the “area of distribution” encompasses the concept of area of occupancy. In order for a species to meet the restricted range criterion in accordance with the Guidelines for Using the IUCN Red List Categories and Criteria (May 2003), the species’ area of occupancy must be less than 2,000 km². The total area of the Kruger National Park alone is approximately 20,000 km², while the Hluhluwe iMfolozi Game Reserve in KwaZulu-Natal adds a further 960 km² to the species’ area of occupancy, these two areas together providing habitat for approximately 70% of the national herd. Twenty-three percent of the national herd is kept on private game farms, adding a further 22,274 km² to the area of occupancy.

Growth rate:

Analyses undertaken by the IUCN African Rhino Specialist Group indicate that the national average growth rate of the white rhino population was just over 7% from 1991 to 2010. On average 116 white rhinos are legally hunted annually (0.6% of the national population), although this figure was calculated prior to the measures introduced by South Africa’s Management Authority to prevent pseudo-hunting, and it is expected that the total number of legal hunts will revert to previous hunting levels of between 30 and 70 per year. Approximately 3.2% of the national population is currently (2012) lost to poachers, well below the average net 7.2% rate of increase in the white rhino population. Given the underlying historical growth rates, it is expected that the population is currently growing at around 4% per annum.

Non-Detriment Finding:

The NDF demonstrated that legal international trade in live animals as well as the export of hunting trophies from South Africa poses a low risk to the survival of white rhino in South Africa and can be permitted to continue. Currently legal and illegal harvests combined are still within sustainable levels. The Scientific Authority concluded that a quota system for hunting of white rhino is unnecessary at this stage because legal hunting, even factoring in the animals lost to poaching, is currently sustainable and following the successful clampdown on pseudo-hunting through the various measures introduced by the Management Authority in February and April 2012, it can be expected that the number of white rhino hunted in future will revert to lower previous hunting levels, which traditional hunters are able to support. Poaching levels will be closely monitored and should the need arise, a quota system will be developed through collaboration with the SADC Rhino Management Group to ensure that legal hunting remains within sustainable levels. The zero export quota on hunting trophies proposed by Kenya is therefore contrary to the NDF advice provided by South Africa’s Scientific Authority.

It is anticipated that a zero export quota would detrimentally affect the conservation status of South Africa’s white rhino population by undermining economic incentives for the private ownership and protection of rhinos. It would exacerbate an already worrying trend of increasing numbers of rhino owners disinvesting in rhino due to increased costs and risks associated with escalating poaching rates and declining economic incentives to conserve white rhino. The ability for the state and the private sector to gain financially from owning, selling, translocating, viewing via ecotourism and hunting white rhino has greatly contributed to the conservation of this species and its habitat in South Africa. Hunting of white rhino in South Africa started in 1968 when there were only approximately 1,800 white rhino in Africa. Around the same time live sales, mainly through auctions to private land owners, were introduced. The CITES annotated Appendix II listing in 1994 that allowed for the export of live rhino and continued exports of hunting trophies was followed by an exponential increase in the number of white rhino in South Africa, from approximately 6,380 animals in 1994 to the more than 18,800 individuals today. The concomitant increased value of white rhino on auctions has encouraged the expansion of rhino numbers and range and by the beginning of 2011 privately owned game farms provided habitat for 23% of the national herd (approximately 4,300 animals), whilst adding a further 22,274 km² to the national conservation footprint.

The high conservation benefit currently derived from legal hunting of white rhino (questions 22 and 23 of the CITES NDF checklist) contributes greatly to the positive outcome of the NDF undertaken by the Scientific Authority.

POTENTIAL NEGATIVE IMPACT OF PROPOSAL (CoP 16 Prop. 10) SUBMITTED BY KENYA ON A ZERO QUOTA IN HUNTING TROPHIES FOR SOUTH AFRICA AND SWAZILAND UNTIL AT LEAST CoP18

Based on the information provided above, South Africa is of the view that the South African population of white rhino is appropriately listed in Appendix II of CITES and that the proposal submitted by Kenya will result in a prohibition that is stricter than an Appendix I listing. In terms of Resolution 2.11 trade in hunting trophies are allowed provided it is authorised in terms of Article III of the Convention.

South Africa acknowledges and supports the information provided by Swaziland in its letter, dated 3 October 2012. Swaziland indicates that the affected range States (South Africa and Swaziland) were not consulted on the substance of the proposal, thereby not providing the countries that will be impacted by the proposal with an opportunity to respond and provide pertinent information that should be considered by Parties to CITES. Swaziland furthermore emphasizes the conservation successes achieved by both countries in terms of the conservation of rhino, including difficult anti-poaching and enforcement actions that have to be taken. South Africa agrees with the following statement made by Swaziland, relating to the potential disinvestment in rhino, should the zero quota proposed by Kenya be adopted: *“it could become catastrophic for rhino conservation and may also result in reduced wildlife range being protected”*.

As discussed above, it is anticipated that a zero export quota would detrimentally affect the conservation status of South Africa's white rhino population by undermining economic incentives for the private ownership and protection of rhinos. It would exacerbate an already worrying trend of increasing numbers of rhino owners disinvesting in rhino due to increased costs and risks associated with escalating poaching rates and declining economic incentives to conserve white rhino.

The ability for the state and the private sector to gain financially from owning, selling, translocating, viewing via ecotourism and hunting white rhino has greatly contributed to the conservation of this species and its habitat in South Africa. Hunting of white rhino in South Africa started in 1968 when there were only approximately 1,800 white rhino in Africa. The CITES annotated Appendix II listing in 1994, that allowed for the export of live rhino and continued exports of hunting trophies, was followed by an exponential increase in the number of white rhino in South Africa, from approximately 6,380 animals in 1994 to the more than 18,800 individuals today. The concomitant increased value of white rhino on auctions has encouraged the expansion of rhino numbers and range and by the beginning of 2011 privately owned game farms provided habitat for 23% of the national herd (approximately 4,300 animals), whilst adding a further 22,274 km² to the national conservation footprint.

Should the zero export quota as proposed by Kenya be introduced, the following outcomes are anticipated:

- a) The private sector currently keeping white rhino for sport hunting purposes would seek to disinvest in rhino. In the province of KwaZulu-Natal approximately 199 of the approximately 658 privately owned white rhino are kept for sport hunting purposes, whereas in the Eastern Cape and North West Provinces 13% and 85% respectively of the game farms holding white rhino generate revenue from hunting. In the North West Province an estimated 1020 to 1105 rhino are kept for sport hunting purposes. While the Kenyan proposal would not ban hunting on a domestic basis, this is negligible, as only one or two white rhinos are hunted annually by South Africans. Very few hunters would be prepared to hunt rhino if they could not export their trophy for at least 6 years and possibly longer. Those that would be prepared to take the chance would presumably expect a discount on the price. Thus if approved, the Kenyan proposal would be expected to reduce hunting revenue by reducing both the number and cost of hunts.
- b) The live sale price of white rhino would be expected to fall further if the Kenyan proposal is approved. The private sector currently keeping white rhino solely for ecotourism purposes would therefore lose potential revenue generated from selling surplus animals to game farms participating in hunting. Disinvestment by the private sector in white rhino conservation, already observed in the provinces of Mpumalanga and Limpopo, would escalate further due to the rising costs of security against poaching and reduced revenue from live sales.
- c) Selling of surplus white rhinos from state owned protected areas would diminish, resulting in a reduction in revenue that could have been used to purchase new conservation land and to fund anti-poaching measures.

- d) A further consequence of the decline in the sale and subsequent introduction of rhinos to new areas is the expected decline in the meta-population growth rate and overstocking in established populations. Surplus animals should be regularly removed from established populations to maintain productive densities and to provide founder animals that can be used to stock new areas. White rhino have already been introduced to all state owned protected areas that are suitable for the species and as such, the expansion of range and numbers is to a large extent dependent upon the economic incentives for the private sector and communities to conserve rhino.

There is already evidence of increasing disinvestment by the private sector in white rhinos attributed to increased poaching levels and rising security costs and risks, coupled with declining live sale prices and economic incentives. The average value of white rhino sold by the three biggest sellers between 2008 and 2011 has declined by just over ZAR29,000 per head (an average 11.7% decline), while at a recent (September 2012) wildlife auction the average price of white rhino fell by about 45.6% to the average price last recorded by WRSA (Wildlife Ranching South Africa) in 2001. WRSA has also indicated that white rhino has reflected the biggest drop in contribution to the total turnover per live auction, from 25% in 2001 to less than 3% in 2011. If Kenya's proposal was approved it would in all probability depress live sale prices further, thereby disincentivizing rhino ownership to the detriment of rhino conservation in the country.

South Africa is therefore opposed to the imposition of a non-consumptive utilization policy on its white rhino population, which the conservation sector, in partnership with the private sector, has successfully brought back from the brink of extinction in the late 1800s, a time when only 20 to 50 white rhinos survived in the iMfolozi Game Reserve in Natal, to a generally well managed and increasing population today. In fact, with the exception of four Northern white rhino, the entire global population of wild white rhino originates from South Africa, including the white rhino in Kenya, and by the beginning of 2011 there were fewer than 500 populations of white rhino across Africa.

South Africa strongly objects to the proposal, since the South African population does not meet the criteria for inclusion in Appendix I and the proposal is proposing a prohibition stricter than an Appendix I listing.